# IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF TEXAS DALLAS DIVISION

KF TEA USA INC. and KF TEA FRANCHISING LLC,

Plaintiffs,

-against-

TEA N' BOBA ENTERPRISES LLC, TOAN VAN NGUYEN and VY NGUYEN,

Defendants.

Civil Action No. 3:23-cv-02860-X

# PLAINTIFFS' MOTION FOR INTRA-DIVISION TRANSFER

Now comes Plaintiffs KF Tea USA Inc. and KF TEA FRANCHISING LLC (collectively "Plaintiffs") and respectfully move this Court for an Intra-division transfer from the Dallas Division of the Northern District of Texas to the Wichita Falls Division of the Northern District of Texas and would show unto this Honorable Court the following:

At the time of filing of this action, Plaintiffs believed that the Northern District of Texas – Dallas Division would be the proper division to handle all matters related to this cause. However, in light of this Court's Order (Doc. 6) the Plaintiffs would respectfully ask the Court to transfer this matter to the Wichita Falls Division of the Northern District of Texas pursuant to this Court's power pursuant to 28 U.S.C. §§ 1404 and 1406 and would waive any potential hearing on the matter.

December 29, 2023

Respectfully submitted,

/s/Abelino "Abel" Reyna Abelino "Abel" Reyna Bar # 24000087

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Attorneys for Plaintiffs KF Tea USA Inc. and KF Tea Franchising LLC

## **CERTIFICATE OF CONFERENCE**

I hereby certify that a Conference was NOT conducted prior to the filing of the foregoing PLAINTIFFS' MOTION FOR INTRA-DIVISON TRANSFER due to Defendants not having an attorney of record at the time of filing and, to date, Plaintiffs are not aware of any attorney representing the Defendants at this time. It is Plaintiffs understanding that the foregoing Motion is deemed OPPOSED.

/s/Abelino "Abel" Reyna Abelino "Abel" Reyna

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## **CERTIFICATE OF SERVICE**

I hereby certify that on this 29 day of December 2023, I electronically filed the foregoing PLAINTIFFS' MOTION FOR INTRA-DIVISION TRANSFER with the Clerk of the Court using the CM/ECF system and I also served the following by email:

Toan Van Nguyen, Owner Vy Nguyen, Managing Member Tea N' Boba Enterprises LLC 8 Park Place CT Wichita Falls, Texas 76302-1960 Toan nguyen506@yahoo.com

> /s/Abelino "Abel" Reyna Abelino "Abel" Reyna Bar # 24000087

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